

EXHIBIT 7

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MICHIGAN
DOCKET NO.: 2:10-cv-12333-TBG-DRG
MARK D. CHAPMAN, et al.
Plaintiffs
-against-
GENERAL MOTORS, LLC
Defendant
-----X

REMOTE VIDEOTAPED DEPOSITION OF BRUCE DAWSON
TUESDAY, OCTOBER 5, 2021
10:01 a.m.

TRANSCRIPT of the stenographic notes of the
proceedings in the above-entitled matter as taken by
and before DAVID LEVY, a Certified Court Reporter and
Notary Public of the State of New Jersey, held
remotely over the Internet, on Tuesday, October 5,
2021, commencing approximately 10:01 in the forenoon,
pursuant to Notice.

<p style="text-align: right;">Page 74</p> <p>1 did a couple of auto manufacturers. I had also</p> <p>2 talked to the mechanic at the dealership and he</p> <p>3 assured me that the problem was with the</p> <p>4 American-made diesel fuel and it was not with the</p> <p>5 pump.</p> <p>6 Q. Did you ever speak to anyone at GM</p> <p>7 directly --</p> <p>8 A. No.</p> <p>9 Q. -- regarding that 2016 Sierra?</p> <p>10 A. No.</p> <p>11 Q. Did you ever speak to GM directly about</p> <p>12 the fuel pump in the 2016 Sierra?</p> <p>13 A. I don't think so, not GM. All with the</p> <p>14 mechanics that was fixing them.</p> <p>15 Q. Okay. Did you review any ads or</p> <p>16 brochures about the vehicle before you purchased it?</p> <p>17 A. No.</p> <p>18 Q. Did you test-drive the 2016 Sierra prior</p> <p>19 to purchase?</p> <p>20 A. I'm sure I did.</p> <p>21 Q. I believe you mentioned a mechanic at</p> <p>22 the dealership. Did you speak with anyone else about</p> <p>23 the 2016 Sierra before you purchased it?</p> <p>24 A. I expressed my concerns about that pump</p> <p>25 with the sales gentleman, the sales manager and the</p>	<p style="text-align: right;">Page 76</p> <p>1 2016 Sierra?</p> <p>2 A. I'm not clear what you mean by that.</p> <p>3 Q. That's fine. Did you, at the time of</p> <p>4 purchase, did you ask anyone at the dealership any</p> <p>5 other questions about the 2016 Sierra?</p> <p>6 A. Not that I recall.</p> <p>7 Q. And when you purchased the 2016 Sierra,</p> <p>8 did you plan to use it a hundred percent for your</p> <p>9 business?</p> <p>10 A. Yes.</p> <p>11 Q. Did you plan to haul loads in the</p> <p>12 flatbed of the truck?</p> <p>13 A. No.</p> <p>14 Q. But you did plan to use the vehicle for</p> <p>15 towing?</p> <p>16 A. Correct.</p> <p>17 Q. Is that with the same boat trailer that</p> <p>18 you'd used with the 2011 Sierra?</p> <p>19 A. Possibly. I roll the trailers over just</p> <p>20 like I do with trucks, so it would have been the same</p> <p>21 type of trailer.</p> <p>22 Q. And what's the type of trailer</p> <p>23 specifically that you use?</p> <p>24 A. Hostar hydraulic trailers.</p> <p>25 Q. And about how often do you trade these</p>
<p style="text-align: right;">Page 75</p> <p>1 mechanic -- or the salesman and the sales manager.</p> <p>2 And they all had the same line, that it's the fuel,</p> <p>3 it's not the pump.</p> <p>4 Q. When you purchased the 2016 Sierra, did</p> <p>5 you know anyone at the time who owned one?</p> <p>6 A. I'm not certain.</p> <p>7 Q. Okay. What materials were provided to</p> <p>8 you by the dealer regarding the 2016 Sierra?</p> <p>9 A. The owner's manual and the diesel</p> <p>10 supplement manual.</p> <p>11 Q. Did you read the material?</p> <p>12 A. I didn't hear you.</p> <p>13 Q. Did you read these materials?</p> <p>14 A. No.</p> <p>15 Q. Do you still have these materials?</p> <p>16 A. No.</p> <p>17 Q. Did you review a window sticker on the</p> <p>18 2016 Sierra prior to purchase?</p> <p>19 A. Yes.</p> <p>20 Q. And I believe you mentioned that you did</p> <p>21 not communicate with General Motors at about the time</p> <p>22 you decided to purchase the 2016 Sierra right?</p> <p>23 A. Correct.</p> <p>24 Q. And other than we just discussed, did</p> <p>25 you ask any questions to the dealership about the</p>	<p style="text-align: right;">Page 77</p> <p>1 trailers out, as you put it?</p> <p>2 A. About every four years.</p> <p>3 Q. Why is that?</p> <p>4 A. They go under salt water, so they start</p> <p>5 to look lousy. I let somebody else worry about it.</p> <p>6 Q. When you purchased the 2016 Sierra, did</p> <p>7 you plan to let it sit idle for long periods of time?</p> <p>8 A. No.</p> <p>9 Q. And did you ever discuss the specific</p> <p>10 intended use for the 2016 Sierra with folks at the</p> <p>11 dealership?</p> <p>12 A. No, I didn't have to. They know what I</p> <p>13 do.</p> <p>14 Q. When you purchased the 2016 Sierra, who</p> <p>15 did you expect would primarily drive it?</p> <p>16 A. Me.</p> <p>17 Q. Any other drivers?</p> <p>18 A. That's where that Bill Haeberle came in.</p> <p>19 Somewhere in there he drove that truck a couple of</p> <p>20 times.</p> <p>21 Q. Now we discussed that you traded in the</p> <p>22 2016 Sierra; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. And at the time of trade-in, it had</p> <p>25 180,000 miles approximately, does that sound right?</p>


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1 A. I picked up sales brochure -- every one
 2 of these trucks, I'd pick up a sales brochure from
 3 Barlow and go over the specs on the truck.
 4 Q. And did you also see Internet
 5 advertisements related to this vehicle?
 6 A. Yes.
 7 Q. And do you recall what those included?
 8 A. Well, I would actually go looking on the
 9 Internet for comparisons with the Chrysler product,
 10 the Ram, and the Ford and see how the torque specs
 11 and the horsepower specs compared.
 12 Q. And you saw television commercials as
 13 well, is that correct?
 14 A. Yes, I did.
 15 Q. Okay. I now want to turn your attention
 16 to paragraph 51. This paragraph pertains to your
 17 2016 vehicle. And in paragraph 51 about halfway
 18 down, there's a sentence that says, "As plaintiff was
 19 driving his vehicle while towing his client's boat on
 20 an attached trailer, a check engine appeared on his
 21 dashboard and his vehicle suddenly lost power and
 22 stalled. He took the vehicle to an authorized GM
 23 dealership, Jim Browne Chevrolet-Buick-GMC in Dade
 24 city, Florida."
 25 Do you see that, Mr. Dawson?

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1 A. Yes.
 2 Q. Are there any corrections you wish to
 3 make to that statement?
 4 A. Just the pronouns. The vehicle was
 5 being done under my direction but the actual driver
 6 and the person doing this was Bill Haeberle.
 7 Q. And is he also the one that took the
 8 vehicle to Jim Browne Chevrolet?
 9 A. Yes.
 10 MR. PAUL: No further questions.
 11 MS. RAPHAEL: I have no further
 12 questions for you, Mr. Dawson. I will let you
 13 hopefully enjoy the rest of your day.
 14 VIDEOGRAPHER: Counsel, if there are no
 15 further stipulations or objections, I'll close out
 16 the video recording for this proceeding.
 17 Here ends media unit number 3. This
 18 concludes the video recorded virtual remote
 19 deposition of Bruce Dawson taken by the parties on
 20 Tuesday, October 5, 2021. The time is 2:08 p.m.
 21 Eastern Daylight time, and we are going off the
 22 record.
 23 (Time noted: 2:08 p.m.)
 24
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1 C E R T I F I C A T E.
 2 I, DAVID LEVY, a certified court
 3 reporter and notary public of the State of New
 4 Jersey, certify that the foregoing is a true and
 5 accurate transcript of the stenographic notes of the
 6 deposition of said witness who was first duly sworn
 7 by me, on the date and place as hereinbefore set
 8 forth.
 9 I FURTHER CERTIFY that I am neither
 10 attorney, nor counsel for, nor related to or employed
 11 by, any of the parties to the action in which this
 12 deposition was taken, and further that I am not a
 13 relative or employee of any attorney or counsel in
 14 this place, nor am I financially interested in this
 15 case.
 16 IN WITNESS WHEREOF, I have hereunto
 17 set my hand this 20th day of October 2021.
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 20
 21
 22 DAVID LEVY, RPR, CRR
 23 LICENSE NO. 30X100234000
 24
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1 J U R A T / E R R A T A
 2 I have read my testimony in the foregoing transcript
 3 and believe it to be true and correct with the
 4 following changes:
 5 PAGE LINE FROM TO
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 7 _____
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 20 _____
 21 WITNESS SIGNATURE DATE
 22 Subscribed and sworn to before me
 23 this ____ day of _____, 20 ____
 24
 25 Notary Public of the
 State of _____.